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February 7, 2019

**BY MAIL AND ECF**

Honorable William F. Kuntz  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Karen Wald v. The Department of Education of the City of New York  
Civil Action No.: 17-CV-3560(WFK)(SJB)

Dear Judge Kuntz:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for Defendant Board of Education of the City School District of the City of New York ("BOE") (sued herein and doing business as the "The Department of Education of the City of New York") in the above referenced action. Pursuant to this Court's Individual Rules, please find the enclosed courtesy copies of all motion and opposition papers regarding Defendant's Motion for Summary Judgment in the above referenced action:

1. Defendant's Notice of Motion of Summary Judgment, Defendant's Local Rule 56.1 Statement, and Declaration of Assistant Corporation Counsel Bruce Rosenbaum with annexed Exhibits A-N (ECF Dkt. No. 28, Att. 1-17)
2. Memorandum of Law in Support of Defendant's Motion for Summary Judgment (ECF Dkt. No. 28, Att. 18)
3. Declaration of Natalia Kapitonova with annexed Exhibits 1-3, Plaintiff's Responses to Defendant's Statement of Undisputed Facts, Declaration of Karen Wald, Amended Declaration of Patricia Crispino, and Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment (ECF Dkt. Nos. 29-32, 34)
4. Reply Memorandum of Law in Further Support of Defendant's Motion for Summary Judgment (ECF Dkt. No. 33)

In further accordance with the Individual Rules of this Court, a copy of this cover letter will be filed via ECF and sent by mail to the assigned Magistrate Judge and Plaintiff's Counsel.

Respectfully submitted,

*Js/J. Kevin Shaffer*

J. Kevin Shaffer

Assistant Corporation Counsel

Encls.

cc: Honorable Sanket J. Bulsara (without encls.)  
United States Magistrate Judge

Natalia Kapitonova, Esq. (without encls.)  
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